

**UNITED STATES BANKRUPTCY COURT**  
**For the**  
**DISTRICT OF MASSACHUSETTS**

In Re:

Katie Knectel  
Debtor

Chapter 13  
Docket No. 17-30204

**MOTION FOR CONTINUATION OF THE AUTOMATIC STAY AND**  
**REQUEST FOR HEARING WITHIN 30 DAYS**

NOW COMES Katie Knectel, Debtor in the above-captioned matter, and respectfully moves the Court pursuant to 11 U.S.C. § 362 ( c)(3)(B) for an order continuing the Automatic Stay provided under 11 U.S.C. §362(a) as to all creditors. Debtor also requests a hearing date set before the expiration of the thirty (30) day Stay. In support of her Motion, the Debtor states as follows:

1. The Debtor commenced this case on March 24, 2017, by filing a Voluntary Petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. The Debtor's previously filed Chapter 13 case which was dismissed on September 9, 2016.
3. The petition in this case has been filed in good faith. The Debtor was unable to complete her previous plan due to lack income. Debtor voluntarily dismissed her plan. Since that time, the Debtor has obtained a second job and her income has stabilized. Debtor feels that this Chapter 13 Plan will be confirmed and that she will be able to fully perform under the terms of her Plan.
4. The Debtor's prior Dismissed Chapter 13 case was the only case filed by the Debtor and pending during the preceding year.

5. Pursuant to 11 U.S.C. §109(g) the case was not dismissed because the Debtor willfully failed to file or amend their petition or any required documents, or to provide adequate protection ordered by the Court.
6. Pursuant to 11 U.S.C. §109(g) the case was not willfully dismissed by the Debtor following the filing of a Motion for Relief

**WHEREFORE**, the Debtor prays:

A. That this Court continues the Automatic Stay under 11 U.S. C. § 362(a) as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under 11 U.S.C. § 362(c) (1) or (c) (2), or a Motion for Relief is granted under 11 U.S.C. § 362(d).

B. That the Court set a Hearing on this matter within the thirty (30) day period.

Dated: March 24, 2017

Respectfully submitted,

/s/ Katie Knectel

By her Attorney

/s/ Paul A. LaRoche, Esq.

Paul A. LaRoche, Esq.

P. O. Box 504

Gardner, Massachusetts 01440

BBO #560487

Telephone: (978) 632-1633

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**CERTIFICATE OF SERVICE**

**The undersigned hereby certifies** that a true copy of the Debtor's Motion to Continue the Stay and Affidavit of Debtor that was filed with this Court was this day served upon the parties listed below electronically and/or by first class mail.

SIGNED under the pains and penalties of perjury.

March 24, 2017

/s/ Paul A. LaRoche, Esq.  
Paul A. LaRoche  
Attorney for Debtor  
LaRoche Law  
P.O. Box 504  
338 Elm Street  
Gardner, MA 01440  
978-632-1633

Via ECF:

Richard King  
Office of the US Trustee

Denise Pappalardo, Esq.  
Chapter 13 Trustee

All ECF Participants

Via first class mail to the creditors listed on the attached Creditor Matrix.